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June 1, 2022

Hon. Paul A. Engelmayer
U.S. District Court
40 Foley Sq.
New York, NY 10017

Re: *Lovick v. U.S.*, 22 cv 4526 (Habeas Petition)
U.S. v. Jones, et al {Fuguan Lovick}, 18 Cr 834 (PAE)

Dear Judge Engelmayer:

I am counsel for Fuguan Lovick in the above referenced habeas proceeding.

By letter dated May 9, 2022, I requested leave to be appointed as counsel for the limited purpose of filing a “placeholder” petition on behalf of Mr. Lovick. The purpose of the placeholder petition was to assert a claim for habeas relief based upon the Supreme Court’s recent ruling in *Borden v. U.S.*, 141 S.Ct. 1817 (June 10, 2021). Due to the close proximity of the AEDPA filing deadline, I initially requested leave to be appointed as counsel for the limited purpose of filing the placeholder petition in order to protect Mr. Lovick’s rights.

Thereafter, Your Honor appointed me as counsel and the placeholder petition (ECF Doc. 640) was filed. Subsequently, by letter dated June 1, 2022 (ECF Doc. 641), I requested leave to be appointed as counsel for Mr. Lovick for all purposes in the habeas proceeding. Principally, I requested this appointment so I could follow up the filing of the placeholder petition with a counseled submission in support of the claim asserted in the petition. By order dated, August 4, 2021 (ECF Doc. 652), Your Honor appointed me as counsel and directed the Government to respond to the petition. The Government has submitted its response (ECF Doc. 653). Accordingly, in order for Mr. Lovick to have an opportunity to file a counseled submission in support of the petition, I respectfully request leave to file a reply submission on or before September 12, 2022.

I have conferred with the Government and they consent to this request.

Respectfully submitted,

/s/

Jeffrey G. Pittell

cc: Michael Longyear, AUSA
Fuguan Lovick